

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
SOUTHERN DIVISION**

Kathleen Bliss, on behalf of herself, the  
Proposed Nationwide Rule 23 Class, and the  
Proposed Nevada Subclass,

Plaintiff,

v.

CoreCivic, Inc.,

Defendant.

Case No. 2:18-CV-01280-JAD-EJY

**STIPULATION TO EXTEND  
DEADLINES  
(Fourth Request)**

The parties respectfully request that the Court adopt the modifications to the scheduling order set forth below with respect to Defendant's expert disclosures and both parties' class certification briefing:

1. Deadline for Plaintiff to produce Supplemental Declaration from Alexander Wise for use in Plaintiff's class certification briefing set as March 17, 2023.

2. Deadline for Defendant's class certification expert disclosures extended from February 17, 2023 until April 21, 2023.

3. Deadline for completion of class certification expert discovery, which was inadvertently not addressed in the parties' October 14, 2022 Stipulation to Extend Deadlines (Dkt. 216), is extended from November 17, 2022 to May 12, 2023.

4. Class certification briefing schedule modified as proposed in the table below:

<b>Filing</b>	<b>Current Deadline</b>	<b><del>Proposed</del> New Deadline</b>
Plaintiff's opening class certification brief	March 31, 2023	June 2, 2023
Defendant's class certification response brief	May 1, 2023	July 14, 2023

Plaintiff's class certification reply brief	May 31, 2023	August 14, 2023
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This is the fourth request to extend time to file Defendant's expert disclosures and the parties' class certification briefs. (*See* ECF Nos. 86, 155, and 216 (the parties' previous requests).) The existing case schedule has been in place since October 4, 2021. (ECF No. 156.) Since that time, the parties have made significant progress on discovery necessary for class certification. However, the primary outstanding discovery that is relevant to class certification is from third-party telephone vendors. The parties make this request because they are still working to obtain complete data productions from multiple telephone vendors. Securus has agreed to produce, but has not yet begun production of, call data from 16 facilities. Counsel for Securus anticipates that the production will take approximately two weeks. GTL has made two productions to date, but during the 30(b)(6) deposition of the GTL designee, it became apparent that there is additional GTL call data to produce for La Palma Correctional Center, Saguaro Correctional Center, and Northeast Ohio Correctional Center, as well as a potential re-production of call data from Marion County Jail II. GTL's counsel is still confirming the scope of additional production/re-production and has not yet provided a timeframe. Following the Securus production, the parties will need to depose a vendor representative from Securus regarding the call data, and the parties will need time to review the data from both vendors and incorporate it into their analyses.

Date: February 2nd, 2023

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Classes

**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

DATED: February 2, 2023